

Juan C. Chavez, OSB #136428
Amanda Lamb, OSB #222284
Oregon Justice Resource Center
PO Box 5248
Pendleton, OR 97208
Telephone: 503-944-2270
Facsimile: 971-328-3982

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PENDLETON DIVISION

ANSON ALFONSO,

Plaintiffs,

v.

CITY OF PENDLETON, OFFICER NATHAN
BESSETTE and OFFICER CHRISTOPHER
FREEMAN,

Defendants.

Case No. 2:23-cv-00862-HL

UNOPPOSED MOTION FOR EXTENSION OF
TIME

LR 7-1 CERTIFICATION

Pursuant to Local Rule 7-1, Juan C. Chavez, counsel for Plaintiff Anson Alfonso, hereby certifies that he conferred with Dave Lewis, Counsel for the Defendants, on August 19, 2024. Defendants do not oppose this motion.

RELIEF REQUESTED

The Parties request that all current case deadlines be extended by approximately 60 days.

ARGUMENT AND AUTHORITY

Case schedules can be modified and extended based upon a showing of “good cause.”

UNOPPOSED MOTION FOR EXTENSION
OF TIME

Fed. R. Civ. P. 16(b)(4). Here, there is good cause for an extension of case deadlines. Due to Counsel for Plaintiff's medical leave and limited witness availability, depositions of Defendants will not be able to occur until after the current close of discovery date. This extension will allow parties to complete depositions and exchange any outstanding discovery. This motion is not made for purposes of delay.

Based on the foregoing, and given the Parties' and counsels' schedules, the Parties agree to the following proposed case management schedule:

Stage	Current deadline	Proposed deadline
Close of discovery	9/20/24	11/19/24
Joint ADR and Plaintiff's expert disclosures due	10/21/24 if no dispositive motions filed or 30 days after rulings on dispositive motions	12/20/24 if no dispositive motions filed or 30 days after rulings on dispositive motions
Consent to magistrate judge	10/21/24	12/20/24
Dispositive motions due	10/21/24	12/20/24
Defense expert disclosures	11/4/24	1/6/25 if no dispositive motions filed
Expert rebuttal reports due	11/18/24	1/21/25 if no dispositive motions filed
Close of expert discovery	1/13/25	3/14/25 if no dispositive motions filed

CONCLUSION

Based on the foregoing, Plaintiff requests that this joint motion be granted, and that the response deadlines be set.

DATED: August 22, 2024.

/s/Juan C. Chavez
 Juan C. Chavez, OSB No. 136428
 Oregon Justice Resource Center
 PO Box 5248
 Portland, OR 97208
 Of Attorneys for Plaintiff